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05/24/90

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

In The Matter Of:

Docket No. V-W-90-C-51

ALBION-SHERIDAN TOWNSHIP LANDFILL
13355 29-MILE ROAD
ALBION, MICHIGAN

The deposition of ARLO WILKINSON taken at
210 W. Franklin Street, Jackson, Michigan, on May 24, 1990,
commencing at or about the hour of 11:10 a.m., before Roger
D. Thome, a Notary Public in and for the County of Jackson,
State of Michigan.

APPEARANCES:

U.S. ENVIRONMENTAL PROTECTION AGENCY,
OFFICE OF REGIONAL COUNSEL, REGION V,
(By: Beth A. Henning),
230 South Dearborn Street,
Chicago, Illinois 60604, appearing on
behalf of the U.S.E.P.A.

MR. JASON EL-ZEIN, Technical Assistant
to Ms. Henning.

- - -

Roger D. Thome, CSR 2201

US EPA RECORDS CENTER REGION 5



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C O N T E N T S

WITNESS

PAGE

Arlo Wilkinson

Examination by Ms. Henning

3

E X H I B I T S

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1 A R L O W I L K I N S O N

2 having been first duly sworn, was examined and testified
3 under oath as follows:

4 EXAMINATION BY MS. HENNING:

5 Mr. Wilkinson, my name is Beth Henning and as you
6 know I represent the United States, and Jason El-Zein
7 is my technical counterpart, and he's helping me with
8 the Albion-Sheridan landfill. We want to ask you a few
9 questions about the landfill today.

10 Just a couple general rules, so if you have any
11 problems, feel free to stop me. If you don't hear a
12 question that I ask, please ask me to repeat it.

13 If you don't understand what I'm asking, say so,
14 and I'll rephrase it or repeat it. If you realize that
15 you answered a question, one of my earlier questions,
16 and you want to change your answer, tell me that, and
17 we'll make sure that we change the record to reflect
18 that you changed your mind about what you wanted to
19 say.

20 If you want us to stop for a break so you can use
21 the restroom or you want some coffee or water, tell us
22 that.

23 And if you don't know, or don't remember, just say
24 so. You don't have to, you know, speculate. You can
25 just say I don't know.

1 If you answer a question, I'm going to assume that
2 you have heard the question that I asked, and you
3 understand what I'm asking you.

4 Do you understand all of these instructions?

5 A. Yes.

6 Q. All right. Well, would you state your name and spell
7 it for the record.

8 A. Arlo Wilkinson.

9 Q. Could you spell it for us.

10 A. A R L O, and then W I L K I N S O N.

11 Q. Okay. You live at --

12 A. 116 Gibson Place.

13 Q. And that's in Jackson?

14 A. Yes.

15 Q. And, your phone number?

16 A. I couldn't tell you what that is.

17 Q. Okay. Now, you're married?

18 A. Yes.

19 Q. And to whom are you married?

20 A. June -- used to be June Birch.

21 Q. And how long have you been married?

22 A. Oh, about 52 years.

23 Q. And, have you had any children?

24 A. No.

25 Q. No children.

1 Did you attend high school?

2 A. I went 2 years.

3 Q. At --

4 A. Leslie.

5 Q. Pardon me?

6 A. Leslie.

7 Q. And that is located?

8 A. In Ingham County.

9 Q. Are you currently employed?

10 A. No.

11 Q. All right. Do you know what this matter is about, why
12 I'm asking you questions today?

13 A. About the landfill.

14 Q. Right. Did you discuss this case with anyone else?

15 A. Well, quite a few times. I don't know about now, what
16 you're going to ask me, but I have been asked a good
17 many times, quite a few times about the landfill.

18 Q. And, who asked you these questions?

19 A. I don't remember their names. I didn't pay that much
20 attention to it.

21 Q. Were they men from law firms, or --

22 A. They was from -- oh, I think the same outfit you're
23 from, environmental control.

24 Q. No, the only people from the Environmental Protection
25 Agency that would have asked questions to you would be

1 myself, or Jason. Was it someone from Michigan,
2 Department of Natural Resources?

3 A. One woman was from Chicago, and I don't remember what
4 her name was.

5 Q. Would that be me?

6 A. Over the telephone.

7 Q. Her name Susan Kozlowski? Was this about 3 years ago,
8 do you remember, 3 or 4 years ago?

9 A. Well, it was quite a while ago. I don't remember just
10 when. It was on the telephone.

11 Q. Uh-huh. Okay. Have you discussed this case with any
12 attorneys?

13 A. No.

14 Q. Okay. Did you ever review any documents before you
15 discussed the case with maybe myself, or with the other
16 woman from Chicago?

17 A. Somebody bought out some papers, and I read them over,
18 and signed them.

19 Q. Uh-huh.

20 A. I don't remember where they was from, or what they was
21 about now.

22 Q. You don't remember --

23 A. It was about the landfill, but, what I mean, I don't
24 remember what --

25 Q. Well, that's fine. You can say that.

1 Did they give you a copy of what you signed?

2 A. No.

3 Q. They did not. Okay.

4 I'm going to ask you a few questions about your
5 work at the landfill, when you worked for Mr. Stevick.
6 When did you start working for Mr. Stevick at the
7 landfill?

8 A. Well, when he started the dump up.

9 Q. Was that around 1968 or 69?

10 A. Somewhere in there. I was the one that started the
11 dump.

12 Q. When you began working at the landfill, what was your
13 job? What was your responsibility?

14 A. Tell them where to dump, and dig a hole for them to
15 dump in, and then cover it up at night, after we got
16 through -- after the dump closed at night, why, then it
17 was covered it.

18 Q. Was Mr. Stevick on the grounds whenever you directed
19 the customers?

20 A. Very seldom. Maybe he would come 2 or 3 times a week,
21 and he wouldn't stay over an hour at the most.

22 Q. But, he was your supervisor? He gave you instructions?

23 A. Yes.

24 Q. Did you have any other supervisors?

25 A. No.

1 Q. And, Mr. Stevick's full name is?

2 A. Gordon.

3 Q. Gordon Stevick.

4 Did you ever supervise anyone? Did you have
5 anyone working under you, that you directed what to do?

6 A. Well, not really. At one time there was Stevick's
7 grandkids worked there, and they worked after I went
8 home.

9 Q. Would that be Perry Stevick, do you remember?

10 A. Yeah, that was one of them.

11 Q. And, there was another grandchild that worked there?

12 A. Yes.

13 Q. Do you remember his name?

14 A. No, I don't.

15 Q. Do you know whose child that was?

16 A. I think it was Perry's brother.

17 Q. It was Perry's brother?

18 A. I believe.

19 Q. Okay -- did you --

20 A. I didn't pay too much attention to it.

21 Q. So, those were the only other coworkers you had, or did
22 you have some other coworkers?

23 A. No -- well, I say no. Jerry hunt worked there. But, I
24 didn't have anything to do with him.

25 Q. What did Jerry hunt do at the landfill?

1 A. About the same thing I did.

2 Q. Does he live in Albion, or Jackson?

3 A. Albion.

4 Q. He lives in Albion.

5 Do you know if he still lives in the area
6 currently?

7 A. Yes. But, he's under the weather. He's in pretty bad
8 shape.

9 Q. How long did Mr. Hunt work at the landfill?

10 A. Oh, probably not over 3 years anyway.

11 Q. Do you know what years he worked there?

12 A. No, I don't remember.

13 Q. Would you say it was toward the beginning?

14 A. No.

15 Q. Or toward the end?

16 A. It was toward the end.

17 Q. So, the late 70's, maybe?

18 A. He was working there when I quit.

19 Q. And you quit when?

20 A. Gosh, I don't remember. I didn't keep track of
21 anything like that.

22 Q. Okay. Did you quit before the landfill closed?

23 A. Yes.

24 Q. So, you directed where the customers would place their
25 waste at the landfill?

1 A. Yes.

2 Q. And you always did this task, or Mr. Hunt shared with
3 you?

4 A. Well, when he was there, why -- when he first came
5 there, why, he shared it with me, because -- you know,
6 how to do it.

7 Q. So, you would say primarily that you directed where
8 people should place the waste?

9 A. Yes.

10 Q. And, then Mr. Hunt took over when you retired from the
11 landfill?

12 A. Yes.

13 Q. Did anyone else direct where to place the waste?

14 A. Not while I was there.

15 Q. Did Mr. Stevick?

16 A. No.

17 Q. So, he never told --

18 A. He told me where he wanted me to dump it. Other than
19 that, why, that, was it. He left it up to me.

20 Q. Do you recall how the landfill -- how it was laid out?

21 A. Well, it was on a hill to start with, from where I
22 lived. I lived at the bottom of the hill.

23 And, I would take the dozer and dig a trench, and
24 we would fill that trench up, and I would cover it up
25 at night.

1 Then, after we got over the hill, why, they just
2 dumped on top of ground. They didn't dig much.

3 Q. Now, when they dumped and you covered it, what was
4 being placed where you dug out the hole? What kind of
5 garbage was being put --

6 A. Just the average run of garbage, no special thing.

7 Q. Did you ever see any sort of industrial waste come in?

8 A. Well, yes, industrial came in. But, they didn't have
9 anything that would contaminate anything that I could
10 see.

11 Q. Do you recall any sort of sludges coming in?

12 A. Well, they had a pond, and there was one or 2 companies
13 that would bring liquid in there. But, that was from
14 mostly from washing machinery, and things like that.

15 Q. So, the pond is located on the landfill?

16 A. Yes.

17 Q. And, what area of the landfill would you say the pond
18 is located?

19 A. North.

20 Q. The north end. Is the pond still there?

21 A. No, that's been buried. I covered that, filled it in,
22 and covered it up.

23 Q. So, companies came and disposed liquid waste into the
24 pond?

25 A. Yes.

- 1 Q. Would they place it in containers?
- 2 A. No.
- 3 Q. So, they would just discharge it?
- 4 A. Dump it right in the pond.
- 5 Q. How did the waste come to the pond? Was it in a truck,
- 6 or was it in barrels?
- 7 A. In trucks.
- 8 Q. Do you recall what kind of a truck, or what company's
- 9 truck it was?
- 10 A. No, I don't. Oh, I'm not sure. But, I think that the
- 11 Union Steel had their own truck, tank truck, and they
- 12 would bring liquids to the site?
- 13 A. They would bring cleaning fluids, and things like that.
- 14 Q. And they would discharge it into the pond?
- 15 A. Yes.
- 16 Q. And they came while you were working on duty?
- 17 A. Yes.
- 18 Q. And you told them to go and dump it into the pond?
- 19 A. That's what I dug the pond for.
- 20 Q. So, you dug out the pond?
- 21 A. Yes.
- 22 Q. And, do you recall another company coming to the pond?
- 23 A. Yes. There was 2 or 3 other companies. But, Stevick
- 24 took care of that, and they would come from the north
- 25 end. They didn't come up through the south end, where

1 the dump was. They come from the north end, in there,
2 and I didn't pay much attention to them.

3 Q. So, Mr. Stevick directed where they should dispose of
4 their waste?

5 A. Yes.

6 Q. And you had no knowledge of who those companies were?

7 A. I knew who they was. But, I don't remember now, just
8 -- I know Union Steel, and one used to be there on the
9 corner of Michigan Avenue.

10 Q. Corner of Michigan, and what was the other cross
11 street?

12 A. I don't remember now. They went out of business.

13 Q. Do you recall what kind of a business it was, the one
14 that was on the corner of Michigan, that did go out of
15 business? Do you know what they did there?

16 A. Not really. I don't remember now. But, what they
17 brought was just cleaning fluids, or liquids that was
18 cleaning fluids, and they brought in some dry material,
19 and dumped it in the dump too.

20 Q. Do you recall what --

21 A. Brooks Foundry.

22 Q. That was the --

23 A. That was the company, yes.

24 Q. Do you recall what the liquid waste looked like? Was
25 it clear, or did you see them discharging?

1 A. Well, I didn't go up there where they dumped that,
2 because I couldn't leave where the public was dumping.

3 Q. Uh-huh.

4 A. So, I couldn't actually tell. I would say it was just
5 seeing what it looked like afterwards.

6 Q. Uh-huh.

7 A. And, the kids used to come down there, and wade around
8 in that pond, so it couldn't have been too harmful.

9 Q. Do you recall, did the pond have any coloration to it?

10 A. Well, at one time, before they started dumping too much
11 in there, it was kind of a cream color, and then it got
12 kind of bluish white.

13 Q. Now, how did the water get into the pond? Was it a
14 natural spring?

15 A. Yeah, it was just a natural flow of water.

16 Q. And it became a cream color, and then a bluish color
17 later?

18 A. Bluish white.

19 Q. Bluish white later, and then the pond became filled up?

20 A. Yes, and I covered it.

21 Q. What did you fill it with?

22 A. Just ordinary dirt.

23 Q. And at the time the only type of garbage that went in
24 there was liquid waste?

25 A. Yes.

- 1 Q. Nothing else?
- 2 A. No, not that I know of anyway.
- 3 Q. Whenever you worked at the landfill, did Mr. Stevick
- 4 give you any rules, or procedures as to what kind of
- 5 garbage could be placed at the landfill?
- 6 A. No.
- 7 Q. So, he never gave you any sort of guidelines?
- 8 A. No.
- 9 Q. Did anyone ever give you any guidelines?
- 10 A. Not really. There was men from -- I think it was the
- 11 township -- county, or the township.
- 12 They came out there, and he talked to me for quite
- 13 a while.
- 14 Q. Was it a man?
- 15 A. Yes.
- 16 Q. And what did he discuss with you?
- 17 A. Oh, about different things that come in the dump, and
- 18 how long we're open, and when we closed and things like
- 19 that.
- 20 Q. Did he tell you you had some problems?
- 21 A. No.
- 22 Q. Was he out there checking on the dump?
- 23 A. No, he just came out there.
- 24 Q. And he just talked to you about what kind of garbage
- 25 you had at the dump?

1 A. He didn't ask about what kind of garbage it was. He
2 just came out there, and he stood there, and looked
3 around, and watched people come in there, and that was
4 it.

5 Q. So, he never made any comments about what sort of
6 practices would have been followed at the landfill?

7 A. No. That was one thing. I never had any trouble with
8 any of the townships, or the county, or anything like
9 that. They never gave me a moment of trouble.

10 Q. So, you directed the customers where to place the
11 waste?

12 A. Yes.

13 Q. And, you just did this per Mr. Stevick's instructions?

14 A. Yes.

15 Q. So, what instructions did he give you? Do you recall
16 those instructions?

17 A. Well, the only thing he said was to dig a hole, and
18 dump it, and cover it up every night.

19 Q. Did he ever direct you to separate any garbage?

20 A. No.

21 Q. So, there was no direction as to some types of garbage
22 should be placed in certain areas, and other types
23 should be placed in another area?

24 A. No.

25 Q. Just the liquids were to go into the pond?

- 1 A. Just liquids.
- 2 Q. Went into the pond?
- 3 A. Yes.
- 4 Q. And the regular garbage was placed --
- 5 A. That was placed on the high ground.
- 6 Q. On the high ground?
- 7 A. I haven't, where I dug the hole out, and then buried
- 8 it.
- 9 Q. So, this was a different hole then from the pond hole
- 10 that you dug?
- 11 A. Yes.
- 12 Q. How many holes did you dig?
- 13 A. Oh, probably I would say pretty close to a hundred and
- 14 50.
- 15 Q. Were some deeper than others?
- 16 A. Oh, yes, some of them was 25, 30 foot deep.
- 17 Q. And, you would dig these holes and placed garbage until
- 18 it became filled up?
- 19 A. I would place the garbage that came in that day. Then,
- 20 I would cover that 6 inches with dirt. Then, the next
- 21 day, why, we put more garbage on top of that, until we
- 22 got the hole filled up.
- 23 Q. Why did you cover it with 6 inches of dirt?
- 24 A. That's what Stevick told me.
- 25 Q. Do you know why he wanted you to have 6 inches?

1 A. He said it was supposed to be covered every night with
2 6 inches of dirt.

3 Q. Did someone tell him to cover it?

4 A. I don't know.

5 Q. You don't know. Okay.

6 Did you always follow the rule that Mr. Stevick
7 gave to you?

8 A. Pretty much so.

9 Q. No one gave you problems about that?

10 A. Oh, some people come in there, and griped about it.
11 But, they would gripe anyway.

12 Q. Why were they griping?

13 A. Well, I don't know, about having to dump in certain
14 places, and things like that.

15 Q. What do you mean by "dumping in certain places"?

16 A. Well, some of them wanted to dump alongside the
17 driveway.

18 Q. And not go into the landfill?

19 A. Yeah.

20 Q. Why did they want to do that?

21 A. Well, save them from driving up in there, and getting
22 up in there where they was supposed to.

23 Q. Did you drive the trucks in, or they drive their own
24 trucks?

25 A. They drove their own.

- 1 Q. What kind of trucks came into the landfill?
- 2 A. Pretty near all kinds. I don't remember now.
- 3 Q. Big semitrucks?
- 4 A. No, they wasn't semi's. They was stake rack trucks,
5 and dump trucks, and pickups.
- 6 Q. Did any of these trucks have markings on them, from
7 different companies?
- 8 A. Oh, yeah.
- 9 Q. Do you recall any of the names?
- 10 A. No, I don't.
- 11 Q. Do you recall any of the drivers, the people that
12 brought the garbage?
- 13 A. I can't remember names.
- 14 Q. Uh-huh.
- 15 A. Just like you folks, why, I walk out of the door, I
16 couldn't remember what your names was.
- 17 Q. Do you recall maybe what they looked like?
- 18 A. Well, I seen several of them over to Albion, and when I
19 go to Albion, why, they speak to me.
- 20 Q. So, you see them currently in Albion?
- 21 A. Well, I don't go over there very much anymore.
- 22 Q. But, when you do go, you see some people that are
23 familiar from the --
- 24 A. Oh, yes, they used to come up there.
- 25 Q. These people live in Albion?

1 A. Oh, yes, most of them do, Marengo, Homer, different
2 places around there.

3 Q. Do they work in Albion?

4 A. Most of them do.

5 Q. Do you know where they work?

6 A. Well, no, I don't. I couldn't say now.

7 Q. Were they all men that came to the landfill?

8 A. Oh, no, there was some women that came there too.

9 Q. That brought waste?

10 A. I don't remember them. There was -- I remember there
11 was one woman that used to come in there with a pickup
12 truck and she would have -- it had side boards on the
13 pickup, and she would have the pickup full of garbage.

14 Q. What kind of garbage?

15 A. Oh, just ordinary garbage.

16 Q. Ordinary. Okay.

17 So, most of the time you followed Mr. Stevick's
18 rules that he set forth on how to run it?

19 A. Oh, yes.

20 Q. But, there were some times that you didn't always
21 follow the rules?

22 A. Well, to a certain extent, I always followed what he
23 told me when we started out, how it was supposed to be
24 run, and if I had any troubles, why, I would get ahold
25 of him, and ask him.

- 1 Q. Uh-huh.
- 2 A. And, then, go from there.
- 3 Q. What did you consider to be trouble?
- 4 A. Well, according to who came in, and dumped, whether I
- 5 was supposed to collect for it, or whether he did.
- 6 Q. Mr. Stevick collected, you mean?
- 7 A. Yes, he collected from the factories, and trucking
- 8 companies.
- 9 Q. And, did you collect from those companies as well?
- 10 A. No.
- 11 Q. Who did you collect from?
- 12 A. Just the public that came in there, that had things
- 13 that they had to pay for dumping.
- 14 Q. How much did you charge?
- 15 A. Like refrigerators, and stoves, and things like that.
- 16 Q. How much did you charge to dispose of the garbage?
- 17 A. Oh, maybe a dollar, 2 dollars.
- 18 Q. Do you know how much Mr. Stevick charged the companies?
- 19 A. No, I don't.
- 20 Q. Do you know how he charged the companies?
- 21 A. No, I don't.
- 22 Q. So, you weren't aware of any billing --
- 23 A. I didn't pay any attention to him.
- 24 Q. When the public came in to deposit their garbage, did
- 25 you write it down in a record sheet?

- 1 A. No.
- 2 Q. So, you just took the money, and give it to Mr. Stevick
3 at the end of the day?
- 4 A. Yes.
- 5 Q. Are you aware if he recorded the money brought in?
- 6 A. I don't know whether he recorded it or not.
- 7 But, he would most generally get there about, oh,
8 between 10 and 11:00 o'clock in the morning, and he
9 would be gone by noon.
- 10 Q. Uh-huh.
- 11 A. And, that's about all I would see him.
- 12 Q. Why wasn't he at the landfill?
- 13 A. He left that up to me.
- 14 Q. So, he let you run the business there?
- 15 A. Yes. He had other things to attend to, I guess.
- 16 Q. Do you know what those other things were?
- 17 A. No, I don't, outside of he was into selling property,
18 and things like that.
- 19 Q. Uh-huh.
- 20 A. And things like that. And, he was into quite a few
21 things outside of that.
- 22 Q. The people that brought the waste, the companies that
23 brought the waste to the landfill, did they follow Mr.
24 Stevick's rules?
- 25 A. Pretty much so, unless -- outside of where to dump, and

1 when to dump, and things like that.

2 Q. Did Mr. Stevick ever tell you about problems with any
3 of the companies?

4 A. No.

5 Q. No. So, he didn't discuss the companies with you?

6 A. No. The only time that he -- one time he told me that
7 one company wasn't supposed to come in there anymore.

8 Q. Pardon me?

9 A. They wasn't supposed to come in there anymore.

10 Q. Why is that?

11 A. I don't know. I think they was from out of the
12 district, outside of the district.

13 Q. So, you only took garbage from a certain district?

14 A. Yes.

15 Q. Do you know what district that was?

16 A. Sheridan Township, and we accepted some from Homer, and
17 some from Parma. But, mostly it was from Sheridan
18 Township.

19 Q. So, that's where all the public garbage came from?

20 A. Yes.

21 Q. How about the industrial waste, were they limited to
22 those townships too?

23 A. Well, mostly.

24 There's one factory out there on West Michigan
25 Avenue, in Albion, that came in there. I don't

1 remember what the name was.

2 Q. Do you know what kind of business they were engaged in?

3 A. I don't know. But, what they would bring in would be
4 chunks of black material that looked like it had been
5 burned.

6 Q. What do you mean by chunks?

7 A. Well, maybe blocks, what I mean, all different shapes,
8 and it looked like it had been burned. When it was run
9 over by the tractor, it would crush right up.

10 Q. So, it wasn't a real hard material?

11 A. No.

12 Q. And, you would say the chunks were usually about how
13 big?

14 A. Oh, probably not -- not over a foot.

15 Q. A foot long?

16 A. Yes.

17 Q. And, then, how tall would you say?

18 A. Oh, probably 3 or 4 inches.

19 Q. And that was the usual size?

20 A. Yes.

21 Q. And you don't recall where that came from?

22 A. No, I don't.

23 Q. And, you don't know what the black chunks were?

24 A. No.

25 Q. Did Mr. Stevick direct you to put the chunks in a

1 particular place?

2 A. No.

3 Q. So, they went in the hole with the general --

4 A. In the garbage.

5 Q. Okay. Were there any different procedures to follow
6 for different types of waste, such as maybe when sludge
7 came in, would you do something different with the
8 sludges, than you would --

9 A. Well, we had barrels of oil, fuel oil, and maybe a
10 little gasoline into it, not very much gasoline, that
11 they used -- that the gas stations used to change oil,
12 and there would be that used oil, and that would come
13 in a barrel, and I would dump it back there.

14 Q. So, you would dump the barrels out, or you would place
15 the entire barrel?

16 A. Well, most of them that come in like that, why, I dump,
17 because they took them back.

18 Q. They took their barrels back?

19 A. Yes.

20 Q. So, this material that you dumped didn't go in the
21 pond?

22 A. No.

23 Q. It went into the general garbage?

24 A. Yes.

25 Q. And it was an oil, or gas-like material?

1 A. Oil and fuel oil, and things like that.

2 Q. Do you know where the waste came from, what company?

3 A. Mostly just ordinary gas stations.

4 Q. So, some of the local gas stations?

5 A. Well, some of them was Shell, and some of them was Blue
6 Sunoco, and all different.

7 Q. And do you know how frequently they sent the barrels?

8 A. Oh, probably once a month, maybe once in 3 months.

9 Q. Did they ever tell you what was in the barrels?

10 A. No. They didn't say what was in it. They just said
11 sludge.

12 Q. Did Mr. -- I'm sorry, go ahead.

13 A. I could tell by looking at it whether it was material
14 that come from changing oil and things like that.

15 Q. How could you tell?

16 A. I used to run a gas station myself, and I used to have
17 to take care of that stuff myself.

18 Q. Okay. So, you had knowledge of what type of waste was
19 produced at the gas station.

20 When you ran your gas station, how did you dispose
21 of your waste?

22 A. Well, I run the gas station out to Michigan Center, and
23 my brother had a farm on out further, and I would take
24 it out there, and sometimes I would take it down to
25 Jackson to the dump down there.

1 Q. Okay. Do you recall ever making a statement to, maybe
2 that woman from Chicago, about taking many multiple
3 barrels in per week? Was there a time at the landfill
4 that you received many barrels during the week?

5 A. Not too many.

6 Q. So, how many would you say are not too many?

7 A. Oh, I would say maybe -- the limit would probably be
8 10, 12 barrels.

9 Q. And this was per week?

10 A. Yes.

11 Q. And do you know, was this all gasoline, or were there
12 different barrels that came in?

13 A. Well, motor oil, and fuel oil, none with just clear gas
14 in it.

15 Q. So, they were mixed with other --

16 A. Fuel oil, and motor oil.

17 Q. It wasn't mixed with anything else that you knew of?

18 A. No, not that I know of.

19 Q. So, you don't recall seeing 75, or a hundred barrels a
20 week coming in?

21 A. No.

22 Q. As high as that number?

23 A. No.

24 Q. Okay. So, you saw these barrels coming in, the
25 gasoline barrels?

- 1 A. Oh, yes.
- 2 Q. And you emptied them out yourself?
- 3 A. Sometimes.
- 4 Q. And sometimes who else would empty the barrels?
- 5 A. Whoever brought the barrels. If they wanted to take
- 6 the barrels back with them, why, they would dump them.
- 7 Q. But, most of the time the companies took their barrels
- 8 back?
- 9 A. Well, not -- well, yes, I could say that they did.
- 10 Most of them did.
- 11 Then, I used to dump the barrels, and then resell
- 12 the barrels.
- 13 Q. Why did the people take their barrels back?
- 14 A. Fill them up again, and bring them back again.
- 15 Q. So, why would some of the companies leave the barrels
- 16 at the landfill?
- 17 A. I don't know.
- 18 Q. But, did you look at the waste that they brought in?
- 19 A. Oh, yes. When I dumped them, why, I could see the
- 20 waste.
- 21 Q. The barrels that were left at the landfill, though, did
- 22 you look at those as well, even though you didn't dump
- 23 them?
- 24 A. No. Most of them, why, I just run over them with the
- 25 dozer, and bury them.

- 1 Q. So, the drums were crushed, and then they were buried?
- 2 A. Yes.
- 3 Q. Okay. Did Mr. Stevick pay you regularly?
- 4 A. Yes.
- 5 Q. So, every week?
- 6 A. Yes.
- 7 Q. And, it was by a paycheck, with a bank?
- 8 A. Not all the time. Sometimes it was cash money.
- 9 Q. Did he provide any -- did he have any arrangements with
- 10 the state for taxes? Did he take any deductions?
- 11 A. He took the deductions out of my paycheck before he
- 12 paid me.
- 13 Q. And, then he gave you the tax forms, when it came time
- 14 to fill out your taxes?
- 15 A. No, he didn't give me any forms. Well, wait a minute.
- 16 I think at the end of the year, why, he give me a
- 17 statement of how much --
- 18 Q. He paid you?
- 19 A. Paid, and how much taxes he paid, and things like that.
- 20 Q. Did he take any other deductions out of your paycheck?
- 21 A. No.
- 22 Q. So, you just had the paycheck with the taxes taken out?
- 23 A. Yes.
- 24 Q. I have a few other questions for you. I want to go
- 25 through some company names, and I'm going to ask you

1 some questions about the company.

2 So, if it sounds familiar to you, let me know. If
3 you don't have any knowledge of this company ever
4 coming to the landfill, then we'll move on to the next
5 company.

6 But, if you do recall them ever coming to the
7 landfill, then I have some questions that I would like
8 to ask you, okay?

9 So, do you remember the Albion Elevator Company?

10 A. Elevator?

11 Q. Uh-huh.

12 A. Yes.

13 Q. Was that like a grain operation. Do you recall them?

14 A. Yes.

15 Q. Did they ever bring any type of waste to the landfill?

16 A. Well, not too much. Sometimes they would bring some
17 grain that was spoiled, or something like that, or
18 surplus grain.

19 Q. And how did they bring the material to the landfill?

20 A. Well, most generally it was in the carton, or boxes.

21 Q. And who brought them to the landfill?

22 A. The ones that worked there in the feed mill.

23 Q. So they brought it like in a pickup truck?

24 A. Well, you might say. Sometimes they brought it in a
25 car.

- 1 Q. Do you recall when these wastes came from the elevator?
- 2 A. No, I don't remember when.
- 3 Q. Sometime when the landfill was operating, and you were
- 4 working there?
- 5 A. Yes.
- 6 Q. So it consisted of spoiled grain?
- 7 A. That, and scraps that they had.
- 8 Q. What kind of scraps?
- 9 A. Oh, wood, and things like that.
- 10 Q. So, you knew of this because you saw what type of waste
- 11 they were bringing?
- 12 A. Yes.
- 13 Q. Okay. Do you recall any of the names of the people
- 14 that you were dealing with?
- 15 A. Oh, no, I don't remember the names. The elevator there
- 16 off of the alley that goes up the back of Main Street,
- 17 and that alley goes on the east side of that. They was
- 18 situated there in that alleyway, and I don't -- I don't
- 19 remember what their names was.
- 20 Q. Uh-huh. How often would they come to the landfill?
- 21 A. Oh, not very often. I couldn't say just how often.
- 22 Q. Once a month, once a year?
- 23 A. Oh, probably once a month anyway.
- 24 Q. Okay. Were any records kept of what type of waste they
- 25 brought?

- 1 A. No.
- 2 Q. They never had you sign anything?
- 3 A. No.
- 4 Q. They would just pay outright to you?
- 5 A. Well, they didn't pay me. I don't know whether they --
- 6 I wouldn't charge them for it, and I don't know whether
- 7 they paid Stevick or not.
- 8 Q. Why didn't you charge them?
- 9 A. Well, I didn't think with the amount of it, and the
- 10 material, I didn't think it should be charged for.
- 11 Q. Okay. Why did you -- you just thought it was such a
- 12 small amount compared to what else was coming in?
- 13 A. Yeah.
- 14 Q. Did anyone else deal with the company, any other
- 15 employees of the landfill? Did Mr. Stevick?
- 16 A. I don't know.
- 17 Q. Did his grandsons?
- 18 A. I couldn't tell you. I didn't -- what they did, I
- 19 didn't pay any attention to it.
- 20 Q. Do you recall Albion Industries division?
- 21 A. Yes.
- 22 Q. What type of a company was that?
- 23 A. Well, that was -- they made castings, and things like
- 24 that, as far as I know.
- 25 Q. Do you recall them ever bringing in any sort of waste

1 to the landfill?

2 A. Oh, they brought the waste in like forms for materials
3 they made.

4 Q. Forms, what kind of forms?

5 A. Oh, most generally it was wood, and they didn't bring
6 in any metal in, or -- I don't remember them bringing
7 in any liquids in.

8 Q. Uh-huh.

9 So, how did they bring their materials to the
10 landfill? Was that in a truck?

11 A. Oh, most generally, either a truck, or pickup.

12 Q. Was it any specific truck?

13 A. No.

14 Q. So, you don't recall what kind of vehicle it might have
15 been?

16 A. No, I don't.

17 Q. So, you saw the types of waste that they brought in?

18 A. Oh, yes.

19 Q. So, that's how you knew what it consisted of?

20 A. Yes.

21 Q. Do you recall any of the names of the people that you
22 dealt with?

23 A. No, I don't.

24 Q. And, you don't have any recollection of any records
25 being kept?

- 1 A. No.
- 2 Q. Did Mr. Stevick ever deal with this company?
- 3 A. I couldn't say. I never paid any attention to what he
- 4 did. As long as he left me alone, why, we got along
- 5 all right.
- 6 Q. Do you recall the Albion Machine and Tool Company?
- 7 A. Yes.
- 8 Q. What type of business were they involved in?
- 9 A. Gosh, I couldn't tell you.
- 10 Q. So, do you remember --
- 11 A. The only thing I know is, they brought some cleaning
- 12 liquid out once in a while.
- 13 Q. What type of cleaning liquid?
- 14 A. Oh, it was like fuel oil, and stuff like that, that
- 15 they cleaned the machines with.
- 16 Q. And, was it mixed with anything else?
- 17 A. Not very often. Most generally it was just in maybe a
- 18 5 gallon carton.
- 19 Q. Pardon me?
- 20 A. It was maybe in a 5 gallon carton, plastic carton, or
- 21 metal can.
- 22 Q. And, how did you dispose of this waste?
- 23 A. I just dumped it right there in the landfill, and ran
- 24 over it, and packed it down with the dozer.
- 25 Q. So, you didn't pour any of it out?

- 1 A. No.
- 2 Q. Did the materials come in the landfill in a truck?
- 3 A. Most generally a pickup or a car.
- 4 Q. Do you recall whose car or pickup?
- 5 A. No, I don't.
- 6 Q. Do you recall any of the names of the people you might
7 have dealt with?
- 8 A. No, I can't remember names.
- 9 Q. Do you recall how often they came to the landfill?
- 10 A. No, I don't. There's people that come in there every
11 day and people come in once a month, and some come in
12 once in 6 months.
- 13 Q. Okay. Do you remember the Albion Pattern Company?
- 14 A. No, I don't.
- 15 Q. Okay. How about the Albion Colloid Company, do you ever
16 recall hearing of that company?
- 17 A. No.
- 18 Q. How about Albion Sanitary Service?
- 19 A. Yeah.
- 20 Q. They ever come to the landfill?
- 21 A. They came in there occasionally.
- 22 Q. And what did they bring in the landfill?
- 23 A. Most generally the regular kind of garbage, like wood,
24 and things like that, pieces of wood.
- 25 Q. How would they bring the materials to the landfill?

- 1 A. Well, some of them brought them in a pickup, and some
2 in other trucks.
- 3 Q. You mean employees of the company?
- 4 A. Yes.
- 5 Q. And do you remember their names?
- 6 A. No, I don't.
- 7 Q. Or, what they look like?
- 8 A. Well, I couldn't tell you right now. If I seen them,
9 why, I would remember where they worked.
- 10 Q. How often did they come to the landfill?
- 11 A. Well, some of them was there pretty near every day.
- 12 Q. But, it was mainly household waste that they brought?
- 13 A. Yes, mostly.
- 14 Q. Where did they get the household waste?
- 15 A. I don't know. I never inquired.
- 16 Q. Do you recall the Brown Weld Service?
- 17 A. Brown Wells?
- 18 Q. Weld.
- 19 A. Brown Weld. Oh, yeah, a colored fellow.
- 20 Q. What kind of a business was that?
- 21 A. That was just welding, things like that.
- 22 Q. And did they ever come to the landfill?
- 23 A. Oh, yeah, they came, and brought their scrap.
- 24 Q. They brought scrap metal?
- 25 A. Not very much metal, mostly wood, and things like that.

- 1 Q. They bring any other types of waste?
- 2 A. No, not that I ever remember of.
- 3 Q. Do you recall how frequently they might have come to
- 4 the landfill?
- 5 A. Oh, probably maybe once a month.
- 6 Q. And they came --
- 7 A. Maybe once in 2 months.
- 8 Q. They come in a truck, or a car?
- 9 A. Most generally they had their welder's truck, the truck
- 10 with the welder on it. They would put the material in
- 11 the side of welder truck.
- 12 Q. And did Mr. Stevick ever deal with this company?
- 13 A. I don't know.
- 14 Q. Do you recall Brooks Foundry?
- 15 A. Yes.
- 16 Q. What kind of business is that?
- 17 A. Well, as far as I know they made castings, and things
- 18 like that.
- 19 Q. And did they bring materials to the landfill?
- 20 A. Oh, yes, some: not too much.
- 21 Q. Do you recall what they brought to the landfill?
- 22 A. Mostly what they brought was like scrap wood, and
- 23 things like that.
- 24 Q. They bring any other types of waste?
- 25 A. Not that I remember of.

1 Q. Do you recall how often they came?

2 A. Oh, probably once a month.

3 Q. And they came in a Brooks truck?

4 A. Well, sometimes. Sometimes one of the fellows that
5 worked there would bring it, in his pickup.

6 Q. Okay.

7 Do you recall anything else about Brooks Foundry?

8 A. No, outside of, they had their own place to dump their
9 liquids and things.

10 Q. So, they dumped their liquids where?

11 A. I don't know where it was.

12 Q. But --

13 A. Whether it was there on their property. They had a
14 pond down there, you know. And, I don't know whether
15 they dumped anything in that pond or not. Generally
16 the liquid come down to the pond.

17 Q. Did they ever dump any liquid in your pond?

18 A. No.

19 Q. Do you recall Decker Manufacturing?

20 A. What?

21 Q. Decker Manufacturing.

22 A. Decker, yes.

23 Q. What kind of business is that?

24 A. Well, I don't remember just what it was. But, what
25 they brought was like wood, and maybe cloth, things

- 1 like that, a piece of cloth.
- 2 Q. Any other types of waste?
- 3 A. Not -- once in a great while they would bring out some
- 4 cleaning fluid.
- 5 Q. What kind of cleaning fluid?
- 6 A. Most generally fuel oil, and kerosene.
- 7 Q. And how did they bring that to the landfill?
- 8 A. Most generally in the barrel.
- 9 Q. And then, would you dump --
- 10 A. They would dump it.
- 11 Q. And, then they would take their barrels back?
- 12 A. Yes.
- 13 Q. And these barrels would be dumped into the pond?
- 14 A. No.
- 15 Q. Into the garbage?
- 16 A. Into the landfill.
- 17 Q. And then, you would cover it up?
- 18 A. Yes.
- 19 Q. And the cleaning fluid is the only kind of fuel you saw
- 20 from Decker?
- 21 A. Yes.
- 22 Q. You recall a company called Divco?
- 23 A. Diecast?
- 24 Q. Divco, D I V C O. Do you recall them?
- 25 A. No, I don't.

1 Q. Was there a company named Diecast?

2 A. Yes.

3 Q. And that was in Albion?

4 A. Yes.

5 Q. What type of business was that?

6 A. Well, they made castings for different places, to make
7 materials in. You know what I mean. It's like --
8 well, say, like that box. They make castings forms to
9 make them in. I don't know whether they made the boxes
10 or not. But, what I mean is, they're using that for a
11 reference.

12 MS. HENNING: Let the record reflect the witness
13 was referencing a small metal box that is placed on the
14 table.

15 A. I don't remember what size it was or anything like
16 that.

17 Q. But, something similar to that?

18 A. Yeah, similar. I know they brought out wooden --
19 pieces of wood, that was sometimes 2, 3 feet long,
20 maybe foot and a half high.

21 Q. Where was this company located, do you recall?

22 A. I think it was on West Michigan Avenue.

23 Q. I see.

24 A. Or off West Michigan Avenue.

25 Q. Do you recall if it's still in business now?

- 1 A. I don't think they are. I'm not sure. I haven't been
2 down in that area for so long that -- I can't remember.
- 3 Q. Do they ever bring any other types of waste to the
4 landfill?
- 5 A. No, not that I know of.
- 6 Q. Do you recall a company named H & S Service?
- 7 A. H & S?
- 8 Q. Yes.
- 9 A. No.
- 10 Q. How about Hayes-Albion?
- 11 A. Hayes-Albion, yes.
- 12 Q. What kind of company was Hayes-Albion?
- 13 A. That was making machinery, and parts, parts for
14 machinery, and things like that.
- 15 Q. And did they come to the landfill?
- 16 A. Occasionally.
- 17 Q. What kind of --
- 18 A. Wooden forms, and things likes that.
- 19 Q. Any other types of waste?
- 20 A. Not very often.
- 21 Q. Did they ever bring any sand, or any sort of materials
22 such as that?
- 23 A. Occasionally, they would bring sand that they would use
24 in the forms.
- 25 Q. And how would they bring the sand to the landfill?

1 A. Well, generally in a box, or a pale, or something like
2 that.

3 Q. And it would come in one of their company trucks?

4 A. Well, sometimes, sometimes one of the employees would
5 bring them out.

6 Q. Okay.

7 Do you recall any of the names of the employees?

8 A. No, I don't.

9 Q. Okay. And they didn't bring any other types of waste
10 that you can recall?

11 A. No.

12 Q. Do you know how frequently they came to the landfill?

13 A. Not really, no.

14 Q. Maybe once a month, or --\

15 A. Well, probably, I would say probably once a week.

16 Q. Once a week. Okay.

17 Do you recall a company named Pyramid Pattern?

18 A. No, I don't.

19 Q. Okay. How about Reed Plastics, you heard of a company
20 called Reed Plastics?

21 A. No, I don't believe so.

22 Q. Okay. How about Sheridan Industries?

23 A. I heard of them.

24 Q. You know what kind of company that is?

25 A. No, I don't.

- 1 Q. Do you recall if they ever came to the landfill?
- 2 A. I think they did. But, I think all they brought was
- 3 just ordinary rubbish.
- 4 Q. And, you dealt with them? You directed where they
- 5 should place the waste?
- 6 A. Well, they just came up and dumped at the edge of where
- 7 we was dumping.
- 8 Q. And you told them to place it there, or they drove up
- 9 without your instruction?
- 10 A. I didn't -- after I was there a while, why, I didn't
- 11 have to tell them where to dump very many of them.
- 12 Because, they would come in, and back up there, and
- 13 dump, and take off.
- 14 Q. So, how frequently would they come to the landfill?
- 15 A. Oh, probably once a week, or something like that. I
- 16 don't remember. So many came in there that I can't
- 17 remember just who they was, or how often they come.
- 18 Q. Uh-huh. You have any recollection of any other sort of
- 19 waste they might have brought?
- 20 A. No, I don't, just ordinary run of the rubbish.
- 21 Q. Do you recall a company called Steel Pattern and
- 22 Manufacturing?
- 23 A. No, I don't.
- 24 Q. Do you recall a company named Union Steel?
- 25 A. Yes.

1 Q. What type of products did they manufacture?

2 A. They just brought out the sand that they used for -- in
3 their forms, and things like that, and some wooden
4 forms.

5 Q. Do you recall them ever bringing sludges out?

6 A. No, I don't recall them ever bringing any out.

7 Q. Do you know if Mr. Stevick ever dealt with Union Steel?

8 A. I don't know who he dealt with.

9 Q. Did you ever --

10 A. I never paid any attention to it, getting in his
11 business.

12 Q. Do you ever recall a letter from a Mr. Harvey that
13 talked about Union Steel bringing sludges to the
14 landfill?

15 A. No, I don't.

16 Q. It discussed certain types of sludges with a toothpaste
17 like consistency, that they were disposing of at the
18 landfill. You don't recall any such letter?

19 A. No.

20 Q. Mr. Stevick never showed you any such letter?

21 A. No.

22 Q. And you have no recollection of any sludges coming to
23 the landfill?

24 A. No, not -- only sludge that I can remember is where
25 they come in with a tank truck, and dumped into the

1 pond.

2 Q. And, whose tank truck was that?

3 A. Well, Shelar's, for one, and I don't remember who --
4 just who all did come up there: wasn't very many.

5 Q. Shelar brought sludge to the landfill?

6 A. Some.

7 Q. And then also brought liquids?

8 A. Very little liquids. Mostly what they brought was that
9 kind of cleaning fluid, and stuff like that, that I
10 remember.

11 Q. What color was the cleaning fluid?

12 A. Kind of a cream colored.

13 Q. And, do you recall what the cleaning fluid was used
14 for?

15 A. No, I don't.

16 Q. Or where it came from?

17 A. No.

18 Q. They never had you sign any forms, or records?

19 A. No.

20 Q. So, did it smell, or did it have any sort of unique
21 characteristic?

22 A. Up there at the dump, there's a smell there all the
23 time.

24 Q. But, you don't recall this cream colored material
25 smelling?

- 1 A. No.
- 2 Q. And that went into the pond?
- 3 A. Most of the time.
- 4 Q. But, sometimes it went on the rubbish pile?
- 5 A. Unless they brought it in a barrel or something like
- 6 that, and then they dumped it in the dump.
- 7 Q. So, they brought waste in barrels?
- 8 A. Yes.
- 9 Q. And did they leave the barrels there?
- 10 A. No, they dump it, and take the barrels back.
- 11 Q. And, then they come back and dump some more?
- 12 A. Sometimes, yes.
- 13 Q. Do you recall how frequently they came to the landfill?
- 14 A. Not too often. I don't remember exactly.
- 15 Q. Was it more frequent that they would come with a truck,
- 16 than with barrels, or could you really say?
- 17 A. I couldn't say.
- 18 Q. But, you saw them come with both the truck, and
- 19 barrels?
- 20 A. Yes.
- 21 Q. Do you recall a company named McGraw-Edison?
- 22 A. Oh, yes.
- 23 Q. And what kind of business is that?
- 24 A. Well, that was just about like them other ones. They
- 25 made forms for -- to make things out of, and things

1 like that. If I remember right, why, it wasn't any
2 heavy equipment or anything.

3 Q. And, did they come to the landfill to dispose of
4 garbage?

5 A. Yes.

6 Q. And how often would you say they came to the landfill?

7 A. Oh, maybe once a week.

8 Q. And what type of waste did they bring?

9 A. Just ordinary waste, no -- I don't remember them
10 bringing any liquids.

11 Q. No liquids, or sludges?

12 A. Not any amount of it.

13 Q. But, they might have brought a small amount?

14 A. In a barrel or something, and dumped it.

15 Q. Would they leave the barrels, or would they --

16 A. Well, some people would, and some -- but, most of them
17 companies, they take the barrels back.

18 Q. What about McGraw, they take their barrels back?

19 A. Most generally.

20 Q. Pardon me?

21 A. Most generally.

22 Q. But, sometimes they would leave some on site?

23 A. Yes.

24 Q. And then, you would run them over, and bury them?

25 A. Yes.

1 Q. Okay. Do you recall a company named City Disposal?

2 A. Oh, yeah.

3 Q. What type of business is that?

4 A. That was mostly material from different small
5 factories, and things like that, and picking up
6 household garbage from houses, and things like that.

7 Q. And they would bring this material to the landfill?

8 A. Yes.

9 Q. How often would they bring the materials?

10 A. Oh, I think they was out there just about every day.

11 Q. Do you recall them bringing any barrels?

12 A. No, I don't remember them bringing any barrels.

13 Q. Any liquids of any sort?

14 A. No.

15 Q. So, just mainly general refuse?

16 A. Just regular refuse.

17 Q. And they would bring it to the landfill portion, and
18 you would cover that up?

19 A. Yes.

20 Q. Okay.

21 Do you recall a company named Scott's Disposal?

22 A. Scott's, yes.

23 Q. What kind of company was that?

24 A. It picked up garbage mostly.

25 Q. And what type of garbage would they pick up?

- 1 A. Household, a lot of household garbage.
- 2 Q. So, they didn't pick up from the industries like City
- 3 Disposal did?
- 4 A. Not too much.
- 5 Q. But, they might have some industrial garbage?
- 6 A. Oh, maybe a little.
- 7 Q. Do you recall what kind of garbage they brought?
- 8 A. Oh, just mostly just regular household garbage.
- 9 Q. What kind of industrial garbage was it that they
- 10 brought?
- 11 A. Gash, I don't remember that.
- 12 Q. Okay. And, do you recall how often? You said almost
- 13 every day?
- 14 A. Oh, not every day, probably a couple times a week.
- 15 Q. Okay. Do you recall a company named Ideal Foundry?
- 16 A. Ideal, no, I don't.
- 17 Q. Okay. Do you recall a company named Albion Metal
- 18 Products?
- 19 A. Oh, yeah.
- 20 Q. What kind of company was that?
- 21 A. They made metal forms, and things for -- I think they
- 22 made things for automobiles.
- 23 Q. For the automobile industry?
- 24 A. Yes, and tractors, and different things.
- 25 Q. Do you recall what they made?

- 1 A. No.
- 2 Q. What type of waste would they bring?
- 3 A. Just regular waste material.
- 4 Q. Nothing special?
- 5 A. No.
- 6 Q. No -- any liquids?
- 7 A. No.
- 8 Q. Okay. Do you recall a company named St. Clair oil?
- 9 A. I heard of them. But, I didn't -- I don't think they
- 10 came out there.
- 11 Q. Did you ever see any barrels at the site marked with
- 12 St. Clair oil?
- 13 A. No.
- 14 Q. Do you recall a company named Perolin Company?
- 15 A. No.
- 16 Q. Lastly, do you recall a company named Corning glass?
- 17 A. Yes.
- 18 Q. What kind of company was that?
- 19 A. Well, they made glass like windows, and things like
- 20 that, and they -- what they brought out was mostly just
- 21 forms that they used, and wore out, and couldn't use
- 22 anymore.
- 23 Q. Did they bring any other types of waste?
- 24 A. Not very much, that I remember of. Most of theirs was
- 25 like, might have some boxes, about so big, and it had a

1 hole in it, and they would pour the glass in, and then
2 that would make certain things, and then they would
3 bring the forms out there, after it got wore enough so
4 they couldn't make the glass.

5 Q. Do you recall how often they came to the landfill?

6 A. No, I don't remember exactly.

7 Q. And, that was predominantly the type of waste that they
8 brought to the landfill?

9 A. Yeah.

10 Q. They didn't bring anything else?

11 A. Not that I know of. Not that I remember.

12 Q. Were you aware of when the landfill closed?

13 A. Yeah. It closed before I moved away from there.

14 Q. Do you know why it was closed?

15 A. Well, the state, and the people around there, were
16 hollering too much about it.

17 Q. About the landfill?

18 A. Yes.

19 Q. Why were they hollering about the landfill?

20 A. I don't know.

21 Q. You don't have any recollection?

22 A. No.

23 Q. Who made the decision --

24 A. They hollered all the time it was there anyway. So,
25 that didn't --

1 Q. Do you know why they were hollering? They didn't
2 like --

3 A. Just traffic, and different things like that.

4 Q. So, the landfill was very busy, would you say?

5 A. Well, when I was there, it was quite busy.

6 Q. Do you recall any companies that might have brought
7 waste to the landfill that I didn't mention before?

8 A. No. It'll probably come after a while. But, I can't
9 now.

10 Q. Did you perform any closure activities at the landfill?

11 A. Any what?

12 Q. Closure activities? Did you help Mr. Stevick close the
13 landfill down?

14 A. No.

15 Q. So, you were not present at the landfill, when he
16 closed the landfill?

17 A. No.

18 Q. When was the last time you went to the landfill before
19 it closed?

20 A. When I went to the landfill?

21 Q. Before it officially closed.

22 A. Oh, I don't know. I used to live right down, over the
23 hill from there, and I -- our garbage, why, what we
24 had, why, I put it in a pale, and carry it up there,
25 most generally.

- 1 Q. So -- well, go ahead.
- 2 A. Then, I had animals there, pigs, and I had a cow, and a
3 calf, and most of our scrap, why, we fed to them. So,
4 we didn't have too much scrap to go up there.
- 5 Q. So, you still lived at the landfill even though you
6 weren't working for Mr. Stevick any longer?
- 7 A. Yes.
- 8 Q. How long did you live at the landfill?
- 9 A. Well, we moved away from there about 2 years -- a year
10 -- let's see, probably 2 years ago.
- 11 Q. Why did you move?
- 12 A. My wife's niece bought the house where we live, and she
13 come out, and loaded our stuff in the cars, and brought
14 it in, and then came back and got us, and said she was
15 moving us in there.
- 16 Q. When you were still living at the landfill, even though
17 it was closed, did you know of anyone bringing garbage
18 into it?
- 19 A. No.
- 20 Q. So, no one brought in any garbage after the landfill
21 closed?
- 22 A. Not that I know of.
- 23 Q. And, you were living at the landfill?
- 24 A. We lived just right by the gate.
- 25 Q. So, you would see if anybody came into the landfill?

- 1 A. Yes.
- 2 Q. And you would probably hear it?
- 3 A. We probably hear it more than we would see it.
- 4 Q. Did you have any dogs?
- 5 A. Occasionally: not too much.
- 6 Q. So, would they bark sometimes if people would come in?
- 7 A. Well, I used to have hunting dogs, coon dogs, and once
- 8 in a while, they would bark, but not too often.
- 9 Q. So, the only way you knew if someone was coming into
- 10 the landfill, was if you heard it yourself? Your dogs
- 11 wouldn't alert you to it?
- 12 A. No, not unless it was dark. If it was dark, then
- 13 somebody would come around, why, then, they would --
- 14 Q. They would start barking?
- 15 A. Yes.
- 16 Q. So, you were not aware of anyone coming into the site
- 17 after it closed, to deposit any garbage?
- 18 A. No.
- 19 Q. Okay. Do you know what Mr. Stevick did to close the
- 20 landfill. You know how he went about it?
- 21 A. No, I don't.
- 22 Q. So, you weren't aware of any -- did you ever go out and
- 23 walk around the landfill after it was closed by Mr.
- 24 Stevick?
- 25 A. I have been up there a few times.

- 1 Q. Do you -- go ahead.
- 2 A. Not regular. I used to go up there when I would go
3 hunting, I used to go up there or something.
- 4 Q. When was the pond filled in, do you recall?
- 5 A. Oh, that was before I quit. Oh, that was, I would say,
6 probably 10 years ago.
- 7 Q. Okay. And then you finished the pond off? You put the
8 final layer of dirt on top of it?
- 9 A. Yes.
- 10 Q. So, you're not aware of anyone depositing any more
11 garbage in the pond area after you closed that portion?
- 12 A. No.
- 13 Q. How did you close the pond off?
- 14 A. I just pushed dirt in there.
- 15 Q. About 6 inches of dirt?
- 16 A. It ended up with 6 inches on top. Of course, the dirt,
17 why, that would go right into the water, when I first
18 started pushing it in there. Then, after it got filled
19 up, why, then, I put about 6 inches of dirt on top of
20 it.
- 21 Q. Why did you start pushing dirt into the pond?
- 22 A. Just -- he just wanted it filled in, that's all.
- 23 Q. Mr. Stevick wanted it filled in?
- 24 A. Yes.
- 25 Q. And he told you to push the dirt into it?

1 A. Yes.

2 Q. Okay. When you went up hunting on the landfill, do you
3 recall any new barrels, or do you recall the appearance
4 of the landfill? Was there anything sticking out of
5 the ground, or was everything covered?

6 A. Well, everything was covered, except I seen one piece
7 of steel laying up on top of ground.

8 Q. What kind of steel was that?

9 A. Just, oh, pretty near as heavy as a railroad rail, and
10 then I see somebody dumped some barrels in there.

11 Q. Uh-huh.

12 A. They brought the barrels in, and throwed them out.

13 Q. Do you know when those barrels came?

14 A. No, I don't. I don't know how they got in there, to
15 put the barrels in there.

16 Q. So, you don't know if that was before or after the
17 landfill closed?

18 A. That was after the landfill was closed.

19 Q. That the barrels came?

20 A. Yes, that some of the barrels came. Some of them was
21 left when they closed.

22 Q. So, there were some barrels exposed when the landfill
23 closed?

24 A. Yes.

25 Q. Do you recall what was in the barrels?

1 A. No. I would say those up there by the shanty, they had
2 used oil in them, grease, and oil.

3 Q. And what was in the shanty?

4 A. Pardon?

5 Q. What was in the shanty?

6 A. That's where we went in to get out of the weather.

7 Q. So, you didn't store anything in there?

8 A. No, nothing, only maybe shovels, and things like that,
9 a pick.

10 Q. Do you remember how many barrels were on the surface of
11 the landfill whenever you closed, or before the
12 landfill closed?

13 A. No, I don't. I wasn't up there that much.

14 Q. Would you say it was 10, or 20, or 50, or a hundred?

15 A. No, it wasn't -- there wasn't over 3, or 4.

16 Q. 3 or 4 barrels.

17 But, you did see barrels present before the
18 landfill was closed?

19 A. Up there by the shanty, there is 3 barrels up there.

20 Q. Were there other barrels that you might not have seen?

21 A. Well, there could have been.

22 Q. Is the landfill a fairly large site? Is there a lot of
23 acres?

24 A. 20 acres all together.

25 Q. So, could there have been more barrels that you might

1 not have seen?

2 A. Oh, yes.

3 Q. So, you didn't walk the entire landfill?

4 A. No, I didn't search it.

5 Q. Okay. Do you recall anything else being present on the
6 surface?

7 A. Nothing that I can remember.

8 Now, why, they smashed the building down, and
9 they're laying on top of the ground now.

10 Q. Who mashed the building down?

11 A. I couldn't tell you.

12 Q. So, you don't know who might have gone onto the
13 landfill after it closed?

14 A. No.

15 Q. So, after you moved off of the landfill, you really had
16 no contact with it anymore?

17 A. No.

18 Q. But, while you were living there, you still kind of
19 monitored -- you looked --

20 A. Well, I watched to see where people used to come up by
21 the gate, and throw their garbage up there, and I used
22 to watch for that, and make them clean it up.

23 Q. What would you do?

24 A. Well, if they didn't, why, I told them I would call the
25 police on them.

- 1 Q. Uh-huh.
- 2 A. So, they would clean it up then.
- 3 Q. Did Mr. Stevick ask you to do that?
- 4 A. No.
- 5 Q. You just wanted them to clean it up?
- 6 A. I did it on my own because it was right by the gate,
7 and just a little distance from where I was living, and
8 I didn't want all that stuff around there.
- 9 Q. So, what would they do with the garbage when you told
10 them to take it away?
- 11 A. Just put it back in the car, or the pickup. Most
12 generally cars. It would be just small bags of it, you
13 know. It wouldn't be big amounts of it.
- 14 Q. Okay. Do you know how people are gaining access to the
15 landfill? How are they going in there, do you know?
- 16 A. Well, there's a woods on the east side of where the
17 landfill was. I seen where somebody drove up through
18 there, with a car, or pup, or car, or something, and I
19 see where they went through the woods, and up into the
20 landfill.
- 21 Q. How did you see? Did you see tire tracks?
- 22 A. Tire tracks, yes.
- 23 Q. Did they break some branches on the trees?
- 24 A. I didn't look.
- 25 Q. So, you just saw the tire tracks?

- 1 A. Yes.
- 2 Q. Do you know when they came into the landfill?
- 3 A. No, after that, I moved.
- 4 Q. So, that was within the last 2 years that that has
- 5 occurred?
- 6 A. Yes.
- 7 Q. Do you know why -- have you seen new barrels appear, or
- 8 have you been out on the site?
- 9 A. I haven't -- I think you was over there with me, wasn't
- 10 you?
- 11 Q. No. Weren't there some men from a law firm -- didn't
- 12 some men come out from Hayes-Albion, and a law firm,
- 13 did they take you out to the site, to walk around the
- 14 site with you? Did 2 men come out?
- 15 A. They took me over to the factory over there.
- 16 Q. They took you to a factory?
- 17 A. Yes.
- 18 Q. What factory did they take you to?
- 19 A. Gosh, I don't remember the name of it now.
- 20 Q. Was it Hayes-Albion?
- 21 A. I think it was Hayes-Albion.
- 22 Q. Why did they take you to the factory?
- 23 A. Well, they drove around the dump site. They didn't go
- 24 up in there. And, then, we went up there to the
- 25 factory, and looked it over.

- 1 Q. You looked over the factory?
- 2 A. Yes.
- 3 Q. Did they make you look over any papers?
- 4 A. No.
- 5 Q. They make you sign any papers?
- 6 A. I didn't sign any there. Later on, when we got back
- 7 home, why, I signed a paper.
- 8 Q. What did the paper say?
- 9 A. About, whether the landfill -- was materials that was
- 10 in the landfill, whether there was any acid or anything
- 11 like that that I knew about.
- 12 Q. And what did you say?
- 13 A. I told them no.
- 14 Q. That there were no acids that you knew of?
- 15 A. Yes.
- 16 Q. Did you make any comments about whether Hayes-Albion
- 17 brought any waste to the landfill? Did they ask you to
- 18 sign a statement that --
- 19 A. No.
- 20 Q. So, the statement that they had you sign didn't mention
- 21 anything about Hayes-Albion, and their waste practices?
- 22 A. No.
- 23 Q. And they never showed you the paper that you signed?
- 24 A. What I think -- I think what they was trying to do, I
- 25 think they was trying to get Hayes-Albion to -- to

1 blame Hayes-Albion for the dump, for the landfill
2 there. I'm not sure, trying to make them dig it up, or
3 clean it up, or something.

4 Q. Why did you have that opinion?

5 A. Well, different places around, they have made them
6 clean up the dump, and haul it away.

7 Q. They made Hayes-Albion clean up?

8 A. No.

9 Q. Different companies?

10 A. Different outfits, and whether it was the state, or the
11 government, I don't know which.

12 But, I just thought probably that was what they
13 was trying to do up there.

14 Q. So, the piece of paper didn't say anything about
15 Hayes-Albion bringing waste to the landfill?

16 A. No.

17 Q. Did you sign any other papers?

18 A. I signed some papers about how long I worked there, and
19 different things.

20 Q. Was that the paper that Jason brought to you?

21 A. I don't remember now.

22 Q. Do you remember when I spoke to you on the phone, back
23 in February? I called you up, and I asked you how long
24 you worked for the company, and I asked you about
25 different companies that might have brought waste to

1 the landfill. Do you recall that conversation?

2 A. I recall part of it. But, I don't recall just when it
3 was.

4 Q. Uh-huh. And, then, I wrote a paper, and I had Jason
5 bring the paper out to you?

6 A. Yeah, I think that is what --

7 Q. And you went to the bank to have it notarized?

8 A. Yes.

9 Q. You remember what our paper said?

10 A. No, I don't exactly.

11 Q. Do you remember --

12 A. I don't remember right now.

13 Q. Did it say anything about how long you worked for the
14 landfill?

15 A. I think it did.

16 Q. Did it mention any certain companies that might have
17 brought waste to the landfill?

18 A. Gosh, I couldn't say now.

19 Q. Okay. Do you know of any other people that might have
20 knowledge about the landfill, that might have some
21 information of who might have brought waste to the
22 landfill?

23 A. Well, Gary Hunt, he worked there at one time.

24 Q. Uh-huh.

25 A. Jerry Richardson's son worked there. You got his name

1 down there. I think -- no, that was Ron Stevick's son,
2 wasn't it.

3 Q. So, Jerry Richardson's son worked at the landfill?

4 A. I think so.

5 Q. Did he know Perry Stevick?

6 A. Yeah, they're cousins.

7 Q. And, they worked together at the landfill?

8 A. I think so, if I remember right.

9 Q. Do you remember any other persons that might have
10 knowledge about the landfill?

11 A. No, not any amount.

12 Q. So, when the men drove you out to the landfill, you
13 didn't walk on the landfill, you didn't go and look at
14 it, they just drove you on the outskirts of the
15 landfill?

16 A. They just drove around it.

17 Q. They tell you why they wanted you to look at the
18 landfill?

19 A. No, I don't believe so. I don't remember exactly. My
20 memory is about gone.

21 A. See this. I had that broken, and it's affected my
22 brain. So, the memory part of my brain. So --

23 Q. Well, do you recall some things?

24 A. Oh, yeah, I recall quite a few things.

25 Q. So, your memory is not totally gone?

1 A. No.

2 Q. You remember a lot of the activities that went on at
3 the landfill?

4 A. Yeah, some things, and some things I don't remember.

5 Q. Do you know if this is the only landfill in the Albion
6 area that accepts industrial waste?

7 A. Gosh, I don't know.

8 Q. Have you ever heard mention of any other landfills that
9 might take some Albion industry waste?

10 A. Well, at one time out there by the railroad, I used to
11 work for the railroad, and at one time out there, on
12 the west side, they used to dump what looked like ashes
13 to me, in the field outside of the railroad.

14 Q. Who dumped?

15 A. Some shop. I don't know who they was.

16 Q. But, you wouldn't say that that was really a landfill,
17 would you?

18 A. No.

19 Q. So, to the best of your knowledge, would you say that
20 the Albion-Sheridan Township landfill was the only
21 landfill?

22 A. As far as I know.

23 MS. HENNING: I have no further questions.

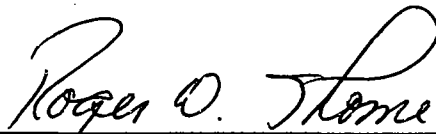
24 (Deposition Concluded at 12:25 p.m.)

25

1 STATE OF MICHIGAN)
2) ss.
3 COUNTY OF JACKSON)

4 I, Roger D. Thome, a Notary Public in and for
5 the above county and state do hereby certify that the
6 deposition of Arlo Wilkinson, was taken before me at the
7 time and place hereinbefore set forth; that the witness was
8 by me first duly sworn to testify to the truth, the whole
9 truth and nothing but the truth; that thereupon the
10 foregoing questions were asked and foregoing answers made by
11 the witness which were duly recorded by me stenographically
12 and later transcribed by means of computer-aided
13 transcription, and I certify that this is a true and correct
14 transcript of my stenographic notes so taken.

15 I further certify that the signature to and
16 the reading of the deposition was not requested by the
17 witness nor by Counsel for the respective parties hereto;
18 also, that I am not of Counsel to either party nor
19 interested in the event of this cause.

20
21 
22

23 Notary Public, Jackson County, Michigan

24 My commission expires January 25, 1993.
25